

Dockets Management Branch (HFA-305)
Food & Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

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I would like to provide some information which I feel is relevant to the FDA,s consideration of new warning labels on sun tanning equipment.

My name is Thomas Mayhall. I am the Director of two fairly large public health programs in Michigan. I am the Director of New Century Inc.. NC Inc. is a State financed non-profit public education and information program that develops Michigan education and advertising programs to prevent underage alcohol and tobacco use. I am also the Director of Highway Safety Associates. HSA is one of Michigan's largest public health alcohol education programs. It deals annually with thousand of court referrals for alcohol abuse problems. I have a M.S. Degree from Michigan State University and I a thoroughly trained and experienced researcher.

My wife approached me several years ago and told me she wanted to open a sun tanning salon. This shocked and kind of embarrassed me and even made me worry about the status of my public health licenses. After all, the risks of sun exposure are well know to everyone. I told her that would be a terrible idea and an embarrassment to me as a well known public health educator. She told me all her friends love to tan and that she still wanted to pursue the idea of opening a tanning salon. At this point I decided I better gather some scientific information to convince her about how damaging the suns ultraviolet light was to people. So I went to the Library at Michigan State University to do some photobiology research.

I though my research wouldn't take to long because this was such a clear issue of good vs. bad. However, my wife (not a person afraid to speak her mind) told me the sun and tanning made her feel so good that she considered all my doom and gloom warnings about the sun to be a bunch of intellectual crap. Now I felt challenged to prove my point.

When I sat down a took an honest look at the actual research on the effects of sunlight on human biology, I was shocked by what I found. I became fascinated with the research in this area and ended up spending the next several months reading every research article I could find on the sun effects on our bodies. It was hard for me to admit, but my wife was right. The actual research on this subject in no way reflects conventional wisdom about the evils of sun exposure. I found that throughout human history, until the last few decades, mankind has always considered sun exposure healthy. It has only been recently (with highly publicized melanoma skin cancer scares) that we

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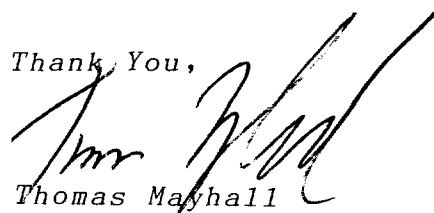
have ignored all the positive effects of the sun.

I learned that I am glad my wife has gotten regular sun exposure over her lifetime. The best research I have seen indicates this will lower her chance of developing breast cancer (and probably several other cancers by probably 30-45%. I learned that who is really more likely to develop melanoma skin cancer is not at all who I thought it was. The most vulnerable person to sun related melanoma skin cancers isn't the person that gets regular moderate exposure (her) but rather a white, college educated (knowns all the conventional wisdom crap) indoor office worker that only occasionally gets sun exposure, like on a Florida vacation (me). In fact I learned that I am more likely to get melanoma skin cancer than somebody that works with his shirt off everyday doing roofing jobs in FLORIDA! NOBODY EVER TOLD ME THAT. I found out that a hereditary predisposition to melanoma is a much more important factor than a persons sun exposure. I learned that my wife has less of a chance of developing osteoporosis (a major concern in her family) because of her regular sun exposure. I found that melanoma skin cancer is not the result of cumulative lifetime sun exposure and that no researchers are even claiming that it is. Anyone that claims it is (and there are many that do) just hasn't read the research.

My wife always justified going out in the sun because it made her feel good. I also thought this was silly until I studied and found out why this is true. It has in part to do with light activated brain chemicals, primarily serotonin and melatonin. I interviewed Dr. Jane Rice Director of the Seasonal Affective Disorder Clinic (SAD) at Michigan State University. I found that in Lansing, Michigan (very cloudy area) about half the patients diagnosed as clinically depressed respond well to light therapies. Many were able to fully recover from their depressions in 7-14 day with such therapies. I confirmed these findings with Dr. Jerome Gallagher (a prominent area psychologist and former public health advisor in the Reagan administration). I have never seen such an amazing and simple therapy. This is very important to us here in the North.

To summarize, I would like to challenge everyone to take a new and objective look at how light affects the human body. The conventional wisdom that tells use the sun is just a carcinogen is wrong and dangerous. While I hate to even say it, because by today's thinking it just sound crazy to most people, but I feel the truth is most people don't get enough sun exposure. Please don't take any actions to further scare people out of the sun or sun similar lighting (particularly in the north). Scaring people out of the sun has very serious, mostly negative, public health consequences.

Thank You,



Thomas Mayhall

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